

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS

No. 6:21-CV-00322-JCB

Hilltop Church of the Nazarene,
Plaintiff,

v.

Church Mutual Insurance Company,
Defendant.

Before BARKER, *District Judge*

DEFENDANT'S EXHIBIT LIST

Judge J. Campbell Barker	PLAINTIFF'S ATTORNEY: G. BRIAN ODOM, LINDSEY P. BRUNING, AND KIRI DEONARINE	DEFENDANT'S ATTORNEY: PRESTON J. DUGAS III AND VINCENT P. CIRCELLI
TRIAL DATE(S): November 14, 2022	COURT REPORTER: SUSAN ZIELIE	COURTROOM DEPUTY: NICOLE CADENHEAD

EXHIBIT NUMBER	DATE OFFERED	ADMITTED	DESCRIPTION (INCLUDING BATES NUMBER IF APPLICABLE)
1			Policy No. 0118133-02-696239; CM 00052-325
2			October 1, 2019 Loss Report; CM 00796-97
3			Claim Payment Log; CM 00590-91
4			Photo Report; CM 00802-70
5			Assignment Notes; CM 00757-60
6			Leading Edge Claims Service Estimate; CM 00788-95
7			Statement of Loss; CM 00957
8			October 14, 2019 Payment Letter; CM 00044
9			January 7, 2020 email from Premier Adjustment Group advising of retention; CM 00029-30
10			Premier Adjustment Group Estimate; CM 00473-82
11			April 16, 2020 EFI Global's Roof Storm Damage Assessment; CM 00346-410
12			April 30, 2020 Denial Letter; CM 00013-15

EXHIBIT NUMBER	DATE OFFERED	ADMITTED	DESCRIPTION (INCLUDING BATES NUMBER IF APPLICABLE)
13			Stonewater Roofing Invoice for \$350; HILLTOP_000613
14			Stonewater Roofing Invoice for \$1500.00; HILLTOP_000500
15			Stonewater Roofing Estimate; HILLTOP_000549-52
16			Stonewater Roofing Contract; HILLTOP_000510-12
17			Insurance Adjusters Group LLC Photos; HILLTOP_000012-71
18			CoreLogic Report; CM 00361
19			Daniel Hillner CV; EXHIBIT A-2 to Defendant's Rule 26(a)(2) Initial Expert Disclosures
20			Photos of the property taken by Daniel Hillner; CM 00364-CM 00410
21			Plaintiff's First Amended Complaint
22			<i>Ford v. Great Am. Assurance Co. & Stephen Christopher Wade</i> , No. W-15-CV-088, 2015 WL 11004910 (W.D. Tex. July 14, 2015); Exhibit 2 to James Maxwell Judge's Deposition
23			StormIntel Hail History Report dated 5/25/2022; Exhibit 3 to James Maxwell Judge's Deposition
24			Cavalry Estimate; Exhibit 10 to Michael Scarlett's Deposition
25			Hilltop's 542A Notice; CM 00562-63
26			Hilltop's DTPA Notice and Demand Letter; CM 00564-65
27			Church Mutual's Election of Liability Letter; CM 00548-49
28			October 26, 2020 Letter; CM 00046
29			October 29, 2020 Letter; CM 00038
30			April 13, 2020 Letter; CM 00037
31			September 12, 2019 Letter; CM 00036
32			March 20, 2020 Letter; CM 00034
33			September 17, 2020 Letter of Representation; CM 00005
34			March 6, 2020 Letter; CM 00001
35			Claim Notes; CM 00573-89

Defendant Church Mutual Insurance Company ("Church Mutual") expressly reserves (and does not waive) its option to refrain from introducing and/or using any of the above-listed exhibits at trial. Church Mutual further reserves the right to introduce

and/or use additional exhibits for demonstrative or illustrative purposes, as well as for purposes of rebuttal, impeachment, or completeness.

Respectfully submitted,

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By: /s/ Lindsey P. Bruning

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**ATTORNEYS FOR DEFENDANT CHURCH
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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing has been served on the following counsel of record in accordance with FEDERAL RULES OF CIVIL PROCEDURE on this 6th day of September, 2022:

<p>Preston J. Dugas III State Bar No. 24050189 pdugas@dcclawfirm.com Vincent P. Circelli State Bar No. 24058804 vcircelli@dcclawfirm.com DUGAS, CHEEK & CIRCELLI, PLLC 1701 River Run, Suite 703 Fort Worth, TX 76107 Telephone: 817-945-3061 Facsimile: 682-219-0761</p> <p>ATTORNEYS FOR PLAINTIFF</p>	
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/s/ Lindsey P. Bruning

Lindsey P. Bruning